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Attorney for Defendant  
Jatinbhai Bhakta

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

**UNITED STATES OF AMERICA,**

**Case No. 1:21-CR-00023-NONE-SKO**

**Plaintiff,**

**STIPULATION TO ALLOW  
DEFENDANT TO TRAVEL OUTSIDE  
OF DISTRICT FOR SPECIFIC DATES &  
ORDER**

**vs.**

**JATINBHAI BHAKTA,**

**Defendant**

The Defendant, JATINBHAI BHAKTA, by and through his attorney of record, Jared M. Thompson, and the United States of America, by and through its attorney of record, David Gappa, hereby stipulate to temporarily modify the defendant's conditions of release to allow for travel outside of the Eastern District of California as follows:

1. Defendant is allowed to leave the Eastern District of California for the sole purpose of attending a family trip to Las Vegas, NV, between the dates of December 30, 2022, to January 2, 2023.
2. Defendant is allowed to leave the Eastern District of California for the purpose stated in paragraph #1 beginning at 5:00 a.m. on December 30, 2022, and must return to the Eastern District of California by 10:00 p.m. on January 2, 2023. Defendant and family are driving to Las Vegas from Bakersfield, so these times incorporate driving time, and possible traffic delays.

3. All other conditions of release remain in full force and effect as set forth in his original conditions of release, including supervision by his designated third party custodian during the travel outside of district.

4. Pre-Trial Services Officer Frank Guerrero was consulted regarding this modification and indicated no objection to Mr. Bhakta attending this family trip.

**IT IS SO STIPULATED.**

DATED: December 16, 2022

Humphrey & Thompson, Attorneys at Law

By: /s/ Jared M. Thompson  
Jared M. Thompson, Attorney for  
Defendant, Jatinbhai Bhakta

DATED: December 16, 2022

United States Attorney's Office

By: /s/ David Gappa  
David Gappa  
Assistant United States Attorney

[ORDER APPEARS ON FOLLOWING PAGE]

**ORDER**

IT IS HEREBY ORDERED that Mr. Bhakta's conditions of release are hereby modified as set forth below:

1. Defendant is allowed to leave the Eastern District of California for the sole purpose of attending a family trip to Las Vegas, NV, between the dates of December 30, 2022 to January 2, 2023.
2. Defendant is allowed to leave the Eastern District of California for the purpose stated in paragraph #1 beginning at 5:00 a.m. on December 30, 2022, and must return to the Eastern District of California by 10:00 p.m. on January 2, 2023.
3. All other conditions of release remain in full force and effect as set forth in his original conditions of release, including supervision by his designated third party custodian during the travel outside of district.
4. Pre-Trial Services Officer Frank Guerrero was consulted regarding this modification and indicated no objection to Mr. Bhakta attending this family trip.

**IT IS SO ORDERED:**

DATED: 12/16/2022

*Sheila K. Oberto*  
SHEILA K. OBERTO  
United States Magistrate Judge